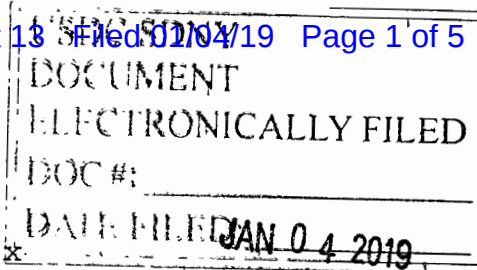


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



UNITED STATES OF AMERICA

: INDICTMENT

- v. -

: 19 Cr.

EMANUEL SULEYMANOV,

70 CRTM 009

Defendant.

x

COUNT ONE

(Conspiracy to Commit Mail Fraud)

The Grand Jury charges:

1. From at least in or about December 2015, up to and including at least in or about December 2016, in the Southern District of New York and elsewhere, EMANUEL SULEYMANOV, the defendant, and others known and unknown, willfully and knowingly, did combine, conspire, confederate, and agree together and with each other to commit mail fraud, in violation of Title 18, United States Code, Section 1341.

2. It was a part and object of the conspiracy that EMANUEL SULEYMANOV, the defendant, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place

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in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom, such matters and things, and would and did cause to be delivered by mail and such carriers according to the directions thereon, and at the places at which they were directed to be delivered by the person to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341, to wit, SULEYMANOV induced diamond merchants in Mumbai, India to ship diamonds by interstate carrier to certain of his co-conspirators in New York, New York by, among other things, (a) purporting to agree to payment terms he did not, and had no intention to, honor, (b) misrepresenting the nature and extent of his relationship to the entity known as Oligarch Diamonds, and (c) intentionally concealing the involvement of his co-conspirators to convey the false impression that Oligarch Diamonds was an independent business and unrelated to the businesses of any co-conspirators.

(Title 18, United States Code, Section 1349.)

FORFEITURE ALLEGATION

3. As the result of committing the offense charged in Count One of this Indictment, EMANUEL SULEYMANOV, the

defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense that the defendant personally obtained.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

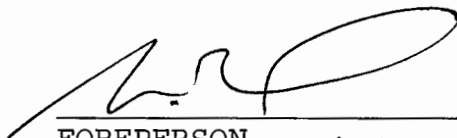
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value;

or

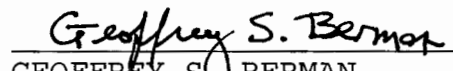
- e. has been commingled with other property which cannot be divided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 18, United States Code, Sections 981;

Title 21, United States Code, Section 853;
Title 28, United States Code, Section 2461.)



FOREPERSON
1/4/19



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

EMANUEL SULEYMANOV,

Defendant.

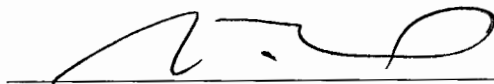
INDICTMENT

19 Cr.

(18 U.S.C. § 1349.)

GEOFFREY S. BERMAN

United States Attorney



Foreperson

1/4/19

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Filed Indictment

Case Assigned to Judge Cote

CSMJ Gorestein

MQ